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**USWEST**

**Robert H. Jackson**  
Executive Director-  
Federal Regulatory

*Ex Parte*

June 7, 1996

RECEIVED

JUN 7 1996

Federal Communications Commission  
Office of Secretary

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222, SC-1170  
Washington, D.C. 20554

Re: CC Docket No. 92-237, *North American Numbering Plan*

Dear Mr. Caton:

Today the following letter was sent by the undersigned to Geraldine Matise, Mary De Luca, Liz Nightingale, Kent Nilsson, David Ward and Brad Wimmer of the Common Carrier Bureau. The letter discusses U S WEST Communications and U S WEST Media Group's immediate needs for Carrier Identification Codes. Please include a copy of this letter in the record in these proceedings.

Acknowledgment and date of receipt of this letter are requested. A duplicate letter is attached for this purpose.

Sincerely,



Attachments

cc: Geraldine Matise  
Mary De Luca  
Liz Nightingale  
Kent Nilsson  
David Ward  
Brad Wimmer

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June 7, 1996

Geraldine Matise, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
2000 M Street, N.W., Room 210  
Washington, D.C. 20054

Re: CC Docket No. 92-237, *North American Numbering Plan*

Dear Ms. Matise:

Currently pending before the Commission is a proposal to modify the current six-year permissive dialing period for three-digit Carrier Identification Codes ("CICs"). This action would enable the Federal Communications Commission ("FCC" or "Commission") to end the moratorium on assignment of additional CICs to entities already having one or more CICs.

U S WEST, Inc., on behalf of its subsidiaries, U S WEST Communications, Inc. ("USWC") and U S WEST Media Group, Inc. ("USWMG"), urges the Commission to take immediate action to end the permissive dialing period January 1, 1997. This action would enable an immediate lifting of the CIC moratorium. U S WEST companies require access to additional CICs to enter the long distance market as permitted by the Communications Act of 1996. U S WEST will enter the long distance market in two significant market areas--both of which will be outside the local serving area of USWC.

One market is metropolitan Atlanta. USWMG owns and operates a cable television company, MediaOne, serving 500,000 customers in the greater Atlanta area. In September 1995, MediaOne began a \$250+ million upgrade and rebuild of its cable system. MediaOne will upgrade 14,000 route miles with a hybrid fiber-coax network. This, in turn, allows MediaOne to offer a full range of facilities-based entertainment and communications services to customers. More than 90% of this construction will be complete by December 31, 1997, with the remainder to be complete in early 1998.

MediaOne has installed a Class 5 switch in Cobb County, Georgia, which will enable MediaOne to offer local and long distance telephone services<sup>1</sup> in direct competition with BellSouth and other providers, including AT&T and MCI. We are in the process of finalizing interconnection arrangements with various carriers. Also, MediaOne has consolidated and upgraded its customer service centers and developed a new customer billing system. Also, we are bringing a new Network Operations Center on line, which

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<sup>1</sup> MediaOne has been certified by the Georgia Public Service Commission to provide intrastate services. MediaOne Business Services is today providing Local Transport for interstate carrier traffic.

will provide 7x24x365 network surveillance and maintenance to ensure high quality service to our customers. MediaOne plans to enter the telecommunications market in late 3Q96 or early 4Q96.

These large capital investments and the new jobs that go with them require MediaOne to begin generating additional cash flow as soon as possible. That, in turn, requires MediaOne to offer a full range of services, including intra- and interstate long distance services branded as MediaOne services. This is especially true in a highly competitive market as Atlanta. As you are aware, in order to provide long distance, MediaOne requires a new CIC. We have applied to the North American Numbering Plan Administrator ("NANPA") for a CIC, but have been turned down because of the FCC's moratorium.

USWC, through its subsidiary U S WEST Long Distance ("USWLD") also has imminent business plans to offer long distance services on an out-of-region basis consistent with the new freedoms obtained under the Communications Act of 1996. For example, USWLD plans to introduce an 800-calling card product and a pre-paid calling card product in partnership with an interexchange carrier yet this year. In addition, USWLD plans to offer long distance services in association with wireless services as it permitted under the new law. USWLD has not yet requested an additional CIC from NANPA because of the moratorium.

The Commission needs to resolve the issues associated with CICs quickly in order to end the current moratorium. As the Commission is well aware, CICs are a condition precedent to market entry; the moratorium acts as a barrier to entry. Entry into new markets is critical to USWC, along with its customers, employees and shareowners. We must have the ability to offer a full range of services to meet customer demands. While we expect to lose customers in the local exchange market due to fair competition, we cannot sit idly by and forfeit customers simply because we cannot offer them the services our competitors can. Similarly, USWC has obligations to its employees and shareowners that require our prompt entry into new markets. The regulatory market barrier to our entry needs to be removed as soon as possible.

If you have any questions, please call me. Thank you for your time and interest on this important matter.

Sincerely,



Robert H. Jackson  
Executive Director -  
Federal Regulatory

cc: Mary De Luca  
Kent Nilsson  
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David Ward  
Brad Wimmer